

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

CAPWEALTH ADVISORS, LLC,

Plaintiff,

v.

TWIN CITY FIRE INSURANCE CO.,

Defendant.

No.: 3:21-cv-00036

Judge Eli J. Richardson

Mag. Judge Barbara D. Holmes

JURY DEMAND

JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER

The parties jointly move the Court to enter the attached proposed Agreed Protective Order so that the parties may exchange information and documents deemed to be confidential. Plaintiff has requested documents and information concerning, *inter alia*, defendant's claims and underwriting files, which defendant deems confidential, but which defendant is prepared to produce upon entry of the attached order. Likewise, defendant has requested documents and information regarding plaintiff's advisory accounts, which plaintiff deems confidential, but which plaintiff is prepared to produce upon entry of the attached order.

The parties submit that this Court's entry of the attached proposed order, or one similar thereto, will aid the parties in the progression of this case.

Respectfully Submitted:

s/Eugene N. Bulso, Jr.

Eugene N. Bulso, Jr. (No. 12005)

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